

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re application of: Chiang Alexander et al.

Confirmation No.: 4982

Application No.: 09/986,221

Group No.: 2178

Filed: 10-22-2001

Examiner: Kyle R. Stork

For: **SYSTEM FOR AUTOMATIC GENERATION OF ARBITRARILY INDEXED  
HYPERLINKED TEXT**

**Mailstop: Appeal Brief - Patents**

Commissioner for Patents

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**REPLY BRIEF**

**Introductory Comments**

In response to the Examiner's answer dated December 15, 2006 (hereinafter "the Examiner's answer"), please consider the following remarks.

## **Remarks**

Claims 1-6, 9-13 and 15-19 currently stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,708,825 to Sotomayor (hereinafter “Sotomayor”) and remain under appeal.

The provisions of independent claim 1 currently at issue are “*copying the first set of hyperlinks, the second set of hyperlinks, and the HTML-encoded target text to a web site; and updating, on a web site, the hyperlinks necessary to link a web page on the web site to a new version of the document* containing the HTML-encoded target text.” (Emphasis supplied.) Independent claims 9 and 16 incorporate similar provisions. The Assignee contends that Sotomayor does not teach or suggest these provisions, and respectfully requests reversal of the rejections of claims 1-6, 9-13 and 15-19 on this basis. In support, each of the assertions presented in the “Response to Arguments” section of the Examiner’s answer (pages 9-11) relating to these provisions is addressed below.

### *Discussion of the Term “Web Site”*

The Examiner’s answer states that the Assignee’s “main argument focuses on the belief that Sotomayor neither discloses nor mentions a ‘web site.’” (Page 10 of the Examiner’s answer.) The Examiner’s answer then asserts that a “web site server can be resident in a local, standalone computer. The website server in this case provides a set of linked web pages for a user, using a local computer to browse.” (Page 10 of the Examiner’s answer.) The Assignee respectfully disagrees. While a user may have access to HyperText Markup Language (HTML) documents residing on the user’s computer by way of a browser, such an arrangement is not a “web site” or “web site server,” given its lack of accessibility by other computers. Otherwise, the terms themselves would be essentially devoid of any meaning, as they would apply to any computer holding HTML files, which would essentially be *any* computer. Certainly, not *all* computers are viewed as web sites or web site servers, as these terms are employed in the art.

The Examiner’s answer further indicates that the appeal brief of October 30, 2006 (hereinafter “the appeal brief”) assumes that “a web site server must be implemented on the ‘Internet’ WAN.” (Page 10 of the Examiner’s answer.) The Assignee respectfully disagrees, as the appeal brief does not characterize web sites so narrowly. Nonetheless, the term cannot be

defined so broadly as to encompass any and all computers, as discussed above.

The Examiner's answer then appears to use this definition of a web site in conjunction with specific disclosures within Sotomayor to prove that Sotomayor discloses the use of web sites in conjunction with its summary page generator. (Pages 10 and 11 of the Examiner's answer.) More specifically, the Examiner's answer indicates that Sotomayor discloses that "a user is connected to the Internet, as the user is able to obtain HTML documents from the [I]nternet (column 11, line 60- column 12, line 9). Summaries are generated from the HTML documents obtained from the Internet (column 12, lines 10-38). These summaries, in HTML and viewable by a browser (column 11, line 60- column 12, line 9), constitute a web site, on a personal intranet consisting of a single user computer." (Page 11 of the Examiner's answer.)

The Assignee respectfully disagrees with this characterization of Sotomayor. For example, while the user may obtain HTML documents from the Internet, Sotomayor does not state that its summary pages are generated from these documents. Instead, Sotomayor indicates that the source and output documents of the summary page generator "*may contain hyperlinks to other documents on other Inter[n]et computers.*" (Column 11, lines 60-63; emphasis supplied.) Further, the particular passage in Sotomayor cited in the Examiner's answer (column 12, lines 10-38) to show that the summarized documents are obtained from the Internet appears to only discuss a software program called AnchorPage™, and not the location of source or summary pages. In any event, Sotomayor does not teach or suggest the use of its summary page generator, or the summary pages resulting therefrom, in conjunction with a web site, as discussed above.

As a consequence of the above, the Assignee contends that Sotomayor does not teach or suggest *copying hyperlinks to, or updating hyperlinks on, a web site*, as provided for in claims 1, 9 and 16, and such indication is respectfully requested.

#### *Updating Hyperlinks on a Web Site*

Specifically with respect to updating, the Examiner's answer indicates that the Assignee "acknowledges that Sotomayor teaches updating (page 10-11 [of the appeal brief]), only contending that the updating is not done to an external source (pages 10-12 [of the appeal brief]). However, it is noted that the feature upon which applicant relies (i.e., updating an external source) is not recited in the rejected claims." (Page 11 of the Examiner's answer.) The Assignee respectfully disagrees with this characterization of the Assignee's arguments. As stated above,

independent claim 1 provides for “copying the first set of hyperlinks, the second set of hyperlinks, and the HTML-encoded target text to a web site; and *updating, on a web site, the hyperlinks* necessary to link a web page on the web site to a new version of the document containing the HTML-encoded target text.” (Emphasis supplied.) In other words, according to the independent claims, hyperlinks on the web site necessary *to link to the materials copied to the web site* (i.e., the claimed two set of hyperlinks and the target text) are updated. As a result, the updated hyperlinks are *external* to those copied materials. Sotomayor does not appear to teach or suggest such updating of hyperlinks external to the documents produced by its summary page generator. Thus, Sotomayor does not teach or suggest the updating operation of claims 1, 9 and 16, and such indication is respectfully requested.

Therefore, based on all of the foregoing, the Assignee respectfully requests reversal of the 35 U.S.C. § 102 rejection of claims 1-6, 9-13 and 15-19.

### Conclusion

Based on the above remarks, the Assignee submits that claims 1-6, 9-13 and 15-19 are allowable. Additional reasons in support of patentability exist, but such reasons are omitted in the interests of clarity and brevity. The Assignee thus respectfully requests allowance of claims 1-6, 9-13 and 15-19.

The Assignee believes no additional fees are due with respect to this filing. However, should the Office determine additional fees are necessary, the Office is hereby authorized to charge Deposit Account No. 08-2025.

Respectfully submitted,

Date: 2/12/07



**SIGNATURE OF PRACTITIONER**

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